RECEIVED

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS NOV 1 4 2007 EASTERN DIVISION MICHAEL W. DORRING

DiANE M. Dillon-Phillips	CLERK, U. S. DISTRICT COURT		
(Name of the plaintiff or plaintiffs)	CIVIL ACTION		
Thresholds Psychiation Conters	07CV6461 JUDGE COAR MAGISTRATE JUDGE MASON		
(Name of the defendant or defendants)			
COMPLAINT OF EMPLOY	MENT DISCRIMINATION		
1. This is an action for employment discriminat	ion.		
2. The plaintiff is DIANE M. [Dillow Phillips of the		
county of Cook	in the state of TiliNois.		
3. The defendant is The C5/10	1ds PSUSIATRIX, whose		
KERPOILITHION CONTERS street address is 4/01 N. KIZVENSWOOD,			
	(state) <u>[///work(ZIP) 60643</u>		
(Defendant's telephone number)	572-5500		
II The plaintiff sought employment or was emp	loyed by the defendant at (street address)		
4101 N. RAVENSONOO	od (city) Chicago		
(county) Cook (state) ZZ (ZI	P code) 60643		
5. The plaintiff [check one box]			
(a) was denied employment by the de	fendant.		
(b) was hired and is still employed by	the defendant.		
(c) was employed but is no longer em			

6. The defendant discriminated against the plaintiff on or about, or beginning on or about, (month) (day) 24, (year) 2007
7.1 (Choose paragraph 7.1 or 7.2, do not complete both.) (a) The defendant is not a federal governmental agency, and the plaintiff [check filed a charge or charges against the defendant
$one\ box$] has filed a charge or charges against the defendant asserting the acts of discrimination indicated in this complaint with any of the following
government agencies:
(i) Ithe United States Equal Employment Opportunity Commission, on or about (month) Octobetz (day) // (year) 2007
(ii) the Illinois Department of Human Rights, on or about (month) (day) 27 (year) 2007 (b) If charges were filed with an agency indicated above, a copy of the charge is
attached. XYES. NO, but plaintiff will file a copy of the charge within 14 days.
It is the policy of both the Equal Employment Opportunity Commission and the Illinois
Department of Human Rights to cross-file with the other agency all charges received. The
plaintiff has no reason to believe that this policy was not followed in this case.
7.2 The defendant is a federal governmental agency, and(a) the plaintiff previously filed a Complaint of Employment Discrimination with the
defendant asserting the acts of discrimination indicated in this court complaint.
Yes (month) (day) (year)
No, did not file Complaint of Employment Discrimination
2. The plaintiff received a Final Agency Decision on (month) (day)(year)
c. Attached is a copy of the
a. Complaint of Employment Discrimination, YES NO, but a copy will be filed within 14 days.
(ii) Final Agency Decision
YES NO, but a copy will be filed within 14 days.

8.	(Complete paragraph 8 only if defendant is not a federal governmental agency.)
	(a) the United States Equal Employment Opportunity Commission has not issued a
	Notice of Right to Sue.
	(b) the United States Equal Employment Opportunity Commission has issued a
	Notice of Right to Sue, which was received by the plaintiff on
	(month) Octobio (day) /2 (year) 200 7a copy of which Notice is attached to this complaint.
9.	The defendant discriminated against the plaintiff because of the plaintiff's [check only those that apply]:
	(a) Age (Age Discrimination Employment Act).
	(b) Color (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
	(c) Disability (Americans with Disabilities Act or Rehabilitation Act)
	(d) National Origin (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
	(e) Race (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
	(f) Religion (Title VII of the Civil Rights Act of 1964)
	(g) Sex (Title VII of the Civil Rights Act of 1964)
10.	If the defendant is a state, county, municipal (city, town or village) or other local
	governmental agency, plaintiff further alleges discrimination on the basis of race, color,
	or national origin (42 U.S.C. § 1983).
11.	Jurisdiction over the statutory violation alleged is conferred as follows: for Title VII
	claims by 28 U.S.C.§1331, 28 U.S.C.§1343(a)(3), and 42 U.S.C.§2000e-5(f)(3); for
	42 U.S.C.§1981 and §1983 by 42 U.S.C.§1988; for the A.D.E.A. by 42 U.S.C.§12117;
	for the Rehabilitation Act, 29 U.S.C. § 791.
12.	The defendant [check only those that apply]
	(a) failed to hire the plaintiff.
	(b) terminated the plaintiff's employment.
	(c) I failed to promote the plaintiff.

	オ
	failed to reasonably accommodate the plaintiff's disabilities.
<u>ح</u> ا(f)	failed to stop harassment;
(g) 2	retaliated against the plaintiff because the plaintiff did something to assert rights protected by the laws identified in paragraphs 9 and 10 above;
(h)	other (specify):
•	
-	
The f	acts supporting the plaintiff's claim of discrimination are as follows:
	20 "Chappe OF Dixapinioning
\mathcal{L}^{\dagger}	e CHARGE OF CASCEMINATION
F	3 DAL 5- THIAMIX DO MOTOLARISTO F
/(_	KM-3 +UINUIS LEUKTIYENTUI
	in out Poten date 1/27/00
X	11111 11 11 \ 101715 (KHP, T) 1/14 /.
	11/1/1/1/1/10 01/10 //01/0//
	may regime sing have fr
	made of the state
	
[AGI	DISCRIMINATION ONLY Defendant knowingly, intentionally, and willfully
[AGI	EDISCRIMINATION ONLY Defendant knowingly, intentionally, and willfully minated against the plaintiff.
discri	minated against the plaintiff.
discri	**DISCRIMINATION ONLY Defendant knowingly, intentionally, and willfully minated against the plaintiff. laintiff demands that the case be tried by a jury. YES NO
discri The p	minated against the plaintiff. laintiff demands that the case be tried by a jury. YES NO
discri The p THE	minated against the plaintiff. laintiff demands that the case be tried by a jury. YES NO REFORE, the plaintiff asks that the court grant the following relief to the plaintiff
discri The p THE	minated against the plaintiff. laintiff demands that the case be tried by a jury. YES NO
discri The p THEI	minated against the plaintiff. laintiff demands that the case be tried by a jury. YES NO REFORE, the plaintiff asks that the court grant the following relief to the plaintiff
discri The p THEI	laintiff demands that the case be tried by a jury. YES NO REFORE, the plaintiff asks that the court grant the following relief to the plaintiff and those that apply]
discri The p THE [check of	minated against the plaintiff. laintiff demands that the case be tried by a jury. YES NO REFORE, the plaintiff asks that the court grant the following relief to the plaintiff
discri The p THE [check of	laintiff demands that the case be tried by a jury. YES NO REFORE, the plaintiff asks that the court grant the following relief to the plaintiff only those that apply] Direct the defendant to hire the plaintiff.
discri The particle of the par	Is a laintiff demands that the case be tried by a jury. YES NO REFORE, the plaintiff asks that the court grant the following relief to the plaintiff only those that apply] Direct the defendant to hire the plaintiff. Direct the defendant to re-employ the plaintiff.
discri The particle of the par	laintiff demands that the case be tried by a jury. YES NO REFORE, the plaintiff asks that the court grant the following relief to the plaintiff only those that apply] Direct the defendant to hire the plaintiff.
discri The p THE [check (a)]	laintiff demands that the case be tried by a jury. YES NO REFORE, the plaintiff asks that the court grant the following relief to the plaintiff only those that apply] Direct the defendant to hire the plaintiff. Direct the defendant to re-employ the plaintiff. Direct the defendant to promote the plaintiff.
discri	laintiff demands that the case be tried by a jury. YES NO REFORE, the plaintiff asks that the court grant the following relief to the plaintiff only those that apply] Direct the defendant to hire the plaintiff. Direct the defendant to re-employ the plaintiff. Direct the defendant to promote the plaintiff. Direct the defendant to reasonably accommodate the plaintiff's religion.
discri The p THE [check (a)]	laintiff demands that the case be tried by a jury. YES NO REFORE, the plaintiff asks that the court grant the following relief to the plaintiff only those that apply] Direct the defendant to hire the plaintiff. Direct the defendant to re-employ the plaintiff. Direct the defendant to promote the plaintiff.

(f)	Direct the defendant to (specify): To Control
Wi	the the plaintiff to conduct
	WERSITY PRINING TO ALL
	LOS POLOS POLOTOR
EX	510 Gees Including Aller
(g) X	If available, grant the plaintiff appropriate injunctive relief, lost wages, liquidated/double damages, front pay, compensatory damages, punitive damages,
	prejudgment interest, post-judgment interest, and costs, including reasonable attorney fees and expert witness fees.
(h) 🗶 🖊	Grant such other relief as the Court may find appropriate.
(Plaintiff)	's signature)
2	in Fillip
(Plaintiff	s name)
DIA	We Frillips
(D1 : .: C	
Plaintiff	s street address) est //4/thP/Ace
ah	12m2 T/ 10/11
(City) (Plaintiff's tel	(State) (ZIP) 6067 ephone number) 73-238-3896
(1 minum 5 le)	Date: 11/14/07

LOCAL RULES 5.2 — 5.4

LR5.2. Form of Papers Filed

(a) PAPER AND FONT SIZE. Each document filed shall be flat and unfolded on opaque, unglazed, white paper approximately 8 ½ x 11 inches in size. It shall be plainly written, or typed, or printed, or prepared by means of a duplicating process, without erasures or interlineations which materially deface it. It shall be bound or secured on the top edge of the document. Where the document is typed, line spacing will be at least 1½ lines. Where it is typed or printed, (1) the size of the type in the body of the text shall be 12 points and that in footnotes, no less than 11 points, and (2) the margins, left-hand, right-hand, top, and bottom, shall each be 1 inch.

THRESHOLDS PSYCHIATRIC

CC:

EEOC Form 161-B (3/98)

Case 1:07-cv-06461 Document 1 Filed 11/14/2007 Page 6 of 17 U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

	NO.	TICE OF RIGHT TO SUE (IS	SUED O	N REQUEST)	
2138	e M. Dillon-Phillips W 114th Place ago, IL 60643		From:	Chicago District Office 500 West Madison St Suite 2800 Chicago, IL 60661	
	On behalf of person(s) aggric CONFIDENTIAL (29 CFR §1				
EEOC Char	ge No.	EEOC Representative		Telephone No.	
		Armernola P. Smith,			
21B-2007	-01477	State & Local Coordina		(312) 886-5973	
NOTICE TO TH	HE PERSON AGGRIEVED:		(See also	the additional information enclosed with this	s form.)
under Title v the ADA m u	VII and/or the ADA based or ≀st be filed in a federal or	n the above-numbered charge. It has	been iss our receip	et (ADA): This is your Notice of Right to Sue sued at your request. Your lawsuit under Tit ot of this notice; or your right to sue based t.)	tle VII or
	More than 180 days have	passed since the filing of this charge	•		
X	Less than 180 days have be able to complete its ad	passed since the filing of this charge ministrative processing within 180 da	e, but I hav	eve determined that it is unlikely that the EE	OC will
X		its processing of this charge.		•	
	The EEOC will continue to	process this charge.			
Age Discrin 90 days afte your case:	nination in Employment A er you receive notice that we	ct (ADEA): You may sue under the A e have completed action on the charg	DEA at ar je. In this	ny time from 60 days after the charge was fi s regard, the paragraph marked below ap	iled until plies to
X	The EEOC is closing your 90 DAYS of your receipt	case. Therefore, your lawsuit under of this Notice. Otherwise, your righ	the ADE/ to sue ba	A must be filed in federal or state court \underline{V} ased on the above-numbered charge will be	<u>VITHIN</u> lost.
	The EEOC is continuing i you may file suit in federal	ts handling of your ADEA case. How I or state court under the ADEA at this	vever, if 60 s time.	60 days have passed since the filing of the o	charge,
n federal or	state court within 2 years (3	e the right to sue under the EPA (filing years for willful violations) of the alle n 2 vears (3 years) before you file t	ged EPA	C charge is not required.) EPA suits must be underpayment. This means that backpay not be collectible.	brought due for
f you file sui	t, based on this charge	se send a copy of your court complain	to this off	fice.	
		On behalf o	of the Com	nmission	
		John P. 1	Rowe	10/12/07	
Enclosures	(s)	John P. F District Di		(Date Mailed)	

Case 1:07-cv-06461 Document 1 Filed 11/14/2007 Page 7 of 17 FILING SUIT IN COURT OF COMPETENT JURISDICTION

PRIVATE SUIT RIGHTS:

This issuance of this Notice of Right to Sue ends EEOC's process with respect to your charge. You may file a lawsuit against the respondent named in your charge within 90 days from the date you receive this Notice. Therefore you should keep a record of this date. Once this 90-day period is over, your right to sue is lost. If you intend to consult an attorney, you should do so as soon as possible. Furthermore, in order to avoid any question that you did not act in a timely manner, if you intend to sue on your own behalf, your suit should be filed well in advance of the expiration of the 90-day period.

You may file your lawsuit in a court of competent jurisdiction. Filing this Notice is not sufficient. A court complaint must contain a short statement of the facts of your case which shows that you are entitled to relief. Generally, suits are brought in the state where the alleged unlawful practice occurred, but in some cases can be brought where relevant employment records are kept, where the employment would have been, or where the respondent has its main office.

You may contact EEOC if you have any questions about your rights, including advice on which court can hear your case, or if you need to inspect and copy information contained in the case file.

A lawsuit against a private employer is generally filed in the U.S. District Court.

A lawsuit under Title VII of the Civil Rights Act of 1964, as amended, against a State agency or a political subdivision of the State is also generally filed in the U.S. District Court.

However, a lawsuit under the Age Discrimination in Employment Act or the Americans with Disabilities Act or, probably, the Equal Pay Act against a **State instrumentality** (an agency directly funded and controlled by the State) can only be filed in a **State court**.

A lawsuit under the Age Discrimination in Employment Act or the Americans with Disabilities Act or the Equal Pay Act against a political subdivision of the State, such as municipalities and counties, may be filed in the U.S. District Court.

For a list of U.S. District Courts, please see reverse side.

IF THE FIRST THREE CHARACTERS OF YOUR <u>EEOC CHARGE NUMBER</u> ARE "21B" <u>AND</u> YOUR CHARGE WAS INVESTIGATED BY THE ILLINOIS DEPARTMENT OF HUMAN RIGHTS (IDHR), REQUEST FOR REVIEWING AND COPYING DOCUMENTS FROM YOUR FILE <u>MUST</u> BE DIRECTED TO IDHR.

ATTORNEY REPRESENTATION:

If you cannot afford or have been unable to obtain a lawyer to represent you, the court having jurisdiction in your case may, assist you in obtaining a lawyer. If you plan to ask the court to help you obtain a lawyer, you must make this request of the court in the form and manner it requires. Your request to the court should be made well before the end of the 90-day period mentioned above. A request for representation does not relieve you of the obligation to file a lawsuit within this 90-day period.

DESTRUCTION OF FILE:

If you file suit, you or your attorney should forward a copy of your court complaint to this office. Your file will then be preserved. Unless you have notified us that you have filed suit, your charge file could be destroyed as early as six months after the date of the Notice of Right to Sue.

IF YOU FILE SUIT, YOU OR YOUR ATTORNEY SHOULD NOTIFY THIS OFFICE WHEN THE LAWSUIT IS RESOLVED.

Case 1:07-cv-064@form@totopmemtWhere File of 114/154/2007 Page 8 of 17

You have been notified of your right to file suit in Federal District Court. Suit is ordinarily filed in the District Court having jurisdiction of the county in which the employer, against whom you filed a charge of employment discrimination, is located. The telephone number listed for each District is that of the Clerk of the Court.

U.S. District Court Northern District of Illinois Eastern Division at Chicago 219 South Dearborn Street Chicago, Illinois 60604 312/435-5670

Counties

Kendall Cook Lake DuPage LaSalle Grundy Will Kane

U.S. District Court Northern District of Illinois Western Division at Rockford 211 South Court Street Federal Building Rockford, Illinois 61101 815/987-4355

Counties

Boone McHenry Ogle Carroll Stephenson DeKalb Whiteside JoDaviess Winnebago Lee

U.S. District Court Southern District of Illinois 750 Missouri Avenue East St. Louis, Illinois 62201 618/482-9370

and

301 West Main Street Benton, Illinois 62812 618/438-0671

Councies

Alexander Johnson Lawrence Bond Calhoun Madison Clark Marion Massac Clay Clinton Monroe Crawford Perry Cumberland Pope Edwards Pulaski Effingham Randolph Richland Fayette Franklin St. Clair Gallatin Saline Union Hamilton Wabash Hardin Washington Jackson Jasper Wayne White Jefferson Williamson Jersey

U.S. District Court Central District of Illinois Danville/Urbana Division 201 North Vermilion Danville, Illinois 61832 217/431-4805

and

201 South Vine 218 U.S. Courthouse Urbana, Illinois 61801 217/373-5830

Counties

Champaign Kankakee Coles Macon Douglas Moultrie Edgar Piatt Ford Vermilion Iroquois

Peoria Division 100 N.E. Monroe Street 135 Federal Building Peoria, Illinois 61602 309/671-7117

Counties

Bureau McLean Fulton Peoria Hancock Putnam Knox Stark Livingston Tazewell Marshall Woodford McDonough

Rock Island Division 211 - 19th Street Rock Island, Illinois 61201 309/793-5778

Counties

Henderson Rock Island Henry Warren

Mercer

Springfield Division 600 East Monroe Street Springfield, Illinois 62701 217/492-4020

Counties

Adams Logan Pike Brown Macoupin Sangamon Cass Mason Schuyler Christian Menard Scott DeWitt Montgomery Shelby Greene Morgan



Rod R. Blagojevich, Governor Rocco J. Claps, Director

TO DESCRIPTION OF C

OCT 1 1 2007

of OFC

Equal Employment Opportunity Complete 2007

500 West Madison

28th Floor

Chicago, Illinois 60605

ATTN: State and Local Unit

I am withdrawing Charge Number <u>2007CA2813</u> from the Illinois Department of Human Rights and hereby request a Right to Sue Notice from EEOC on the following charge:

EEOC Number: 21BA71477

Complainant: Diane M. Dillon-Phillips

Respondent: Thresholds Psychiatric Rehabilitation Centers

Complainant's Signature

Date

#6B 11/93

Rod R. Blagojevich, Governor Rocco J. Claps, Director

June 19, 2007

Diane M. Dillon-Phillips 2138 W. 114th Place Chicago, III 60643

RE: Charge Number 2007CA2813

Complainant - Diane M. Dillon-Phillips

Respondent - Thresholds Psychiatric Rehabilitation Centers

Dear Ms. Dillon-Phillips,

Pursuant to your recent conversation you requested the right to sue notice from the EEOC. Enclosed is an official Voluntary Withdrawal Request Form, which will expedite the dismissal of your charge. Also enclosed is a request for the right to sue notice. I would appreciate it if you would sign the enclosures and return them to my attention immediately.

If you have changed your mind about withdrawing your charge, please contact me immediately at (312) 814-4310 so I can take appropriate action to proceed with your case.

Thank you for your cooperation.

Sincerely

Sue Sakurai

Human Rights Investigator Investigations Section

#6d 11/06 Rod R. Blagojevich, Governor Rocco J. Claps, Director

May 2, 2007

Diane M Dillon-Phillips 2138 W 114th Place Chicago, Illinois 60643

Charge No.:

2007CA2813

Respondent:

Thresholds Psychiatric Rehabilitation Center

Complaint Filing Dates:

04/27/07 thru 05/27/07

Dear Complainant:

You have filed a discrimination charge under the Human Rights Act. A copy of the charge has been served on the Respondent. Keep this letter, have it with you if you need to telephone or come to the Department (DHR). If there is an "A", "E" or "F" in your charge number, we are enclosing an important notice from the Federal Equal Employment Opportunity Commission because your charge has been automatically filed with that agency as well.

When a fact-finding conference is scheduled, you will be advised of the date. It is your responsibility to cooperate with the Department's investigation and provide all pertinent information you have concerning the case by the dates requested.

You have the right to file a complaint with the Human Rights Commission if the Department of Human Rights (DHR) has not completed your case (either by filing a complaint with the Commission or issuing a notice of dismissal) within 365 days from the date you filed your PERFECTED signed and notarized charge or within any extension of that time to which you and the Respondent have agreed in writing.

Your complaint must be filed within 30 days of the expiration of 365 days or extension (see above paragraph). We have calculated the time above (see Complaint Filing Dates). While we have made this calculation with the best of intentions, errors can occur. The Commission has ruled that it is your responsibility to count the number of days properly. If you file a complaint outside this 30-day period, the Commission may dismiss your complaint.

Once 395 days (or the extended time) have passed, DHR must dismiss your charge with prejudice without any further right to proceed if you have not filed a complaint with the Commission. Therefore, you may wish to contact an attorney to decide the best way for you to handle your case. If you file a complaint, the form of the complaint must be in accordance with Section 7A-102(F) of the Human Rights Act. You must serve a copy of the complaint on DHR, on the same day that you file a complaint with the Commission. The Commission will then schedule a hearing for your case before an Administrative Law Judge.

You must advise DHR of all changes of name, address or telephone numbers. If you do not do so, DHR may dismiss your case if it cannot locate you.

IN-6 NON-MED REV. 06/03



U.S EQUAL EMPLOYMENT OPPORTUNITY COMMISSION Chicago District Office 500 West M

500 West Madison St., Suite 2800 Chicago, Il 60661-2511

PH: (312) 353-2713

TDD: (312) 353-2421

ENFORCEMENT FAX: (312) 886-1168

LEGAL FAX: (312) 353-8555

IMPORTANT NOTICE, PLEASE READ CAREFULLY. KEEP THIS NOTICE WITH YOUR OTHER RECORDS OF THIS CHARGE. THIS MAY BE THE ONLY NOTIFICATION FROM EEOC.

IDHR CHARGE NUMBER: 2007CA2813

DILLON-PHILLIPS DIANE M

EEOC NOTICE OF CHARGE FILED

You are filing a charge of employment discrimination with the Illinois Department of Human Rights (IDHR).

As a result of an agreement between the Illinois Department of Human Rights (IDHR) and the U. S. Equal Employment Opportunity Commission (EEOC), the EEOC will also receive for filing the subject charge of discrimination.

You are encouraged to cooperate with the IDHR in the investigation of your charge. The final findings and orders of that agency may be adopted by the EEOC.

The IDHR will process your charge. Under Section 1601.76 of EEOC's regulations, you are entitled to request that EEOC review the IDHR's investigation and findings. To obtain this review, you must request it by writing to this office within 15 days of your receipt of the IDHR's final findings of your case. If we do not receive such a request for a review, EEOC will likely accept the IDHR's findings without any review or any other processing by EEOC.

EEOC regulations require that you notify us of any change in address and keep us informed of any prolonged absence from your current address. Your cooperation in this matter is essential.

PLEASE NOTE: BUILDING SECURITY PROCEDURES PRESENTLY IN PLACE DO NOT PERMIT ACCESS TO EEOC WITHOUT AN APPOINTMENT. IF AN APPOINTMENT IS REQUIRED, CALL (312) 353-2713 OR 1-800-669-4000.

Case 1:07-cv-06461	<u>Filed 11/14/200</u>	
CHARGE OF DISCRIMINATION	AGENCY	CHARGE NUMBER
This form is affected by the Privacy Act of 1974: See Privacy act statemen before completing this form.	t DHR	2007CA2813
07W0425.10A	☐ EEOC	
Illinois Department of Hui	man Rights and	
NAME (indicate Mr. Ms. Mrs.) Diane M. Dillon Phillips	(773) 238-3	PHONE (include area code) 896
STREET ADDRESS CITY, STATE AND	ZIP CODE	DATE OF BIRTH
2138 W. 114 th Place Chicago, IL 60643		04/03/55
NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYM	MENT AGENCY, APE	PRENTICESHIP COMMITTEE, STATE OR
LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINS NAME NUMBER OF EMP	T ME (IF MORE TH	TELEPHONE (Include area code)
Thresholds Psychiatric MEMBERS 15+	LOTEES,	(773) 572-5500
Rehabilitation Centers		COUNTY
STREET ADDRESS CITY, STATE AND ZIP		COUNTY
4101 N. Ravenswood Chicago, IL 60613		
CAUSE OF DISCRIMINATION BASED ON:		DATE OF DISCRIMINATION EARLIEST (ADEA/EPA) LATEST (ALL)
		04/24/07
Race Age Mental Handicap Sex Religion		
THE PARTICULARS ARE (if additional space is needed attach extra sh		CONTINUING ACTION
I. A. ISSUE/BASIS FINAL WRITTEN REPRIMAND – M B. PRIMA FACIE ALLEGATIONS 1. My race is black. 2. My work performance as Assistant I Respondent's expectations. I was him 3. On March 26, 2007, I was issued a fire Program Director for Young Adults reprimand were alleged inappropris (Continued)	Program Directored on October 2 inal written war inal Program. The 1	or for Young Adult Programs met 23, 2006. ning by Patricia Biggs (white), reasons cited for the final written
change my address or telephone number and I will cooperate fully with them	- 12	Y OF April 2007 TURE
Hotary Public, State of Illinois	I declare under penalty	that the foregoing is true and correct I swear or affirm ove charge and that it is true to the best of my and belief

Complainant: Diane M. Dillon Phillips

Charge Number: 2007CA2813

Page 2

4. I vehemently deny that I engaged in either form of misconduct. Moreover, I charged a non-black subordinate of mine, Garrett Raubolt, with the same conduct toward me, however he was not issued a final written reprimand.

II. A. ISSUE/BASIS

FINAL WRITTEN REPRIMAND – MARCH 26, 2007, DUE TO MY SEX, FEMALE

B. PRIMA FACIE ALLEGATIONS

- 1. My sex is female.
- 2. My work performance as Assistant Program Director for Young Adult Programs met Respondent's expectations. I was hired on October 23, 2006.
- 3. On March 26, 2007, I was issued a final written warning by Patricia Biggs (female), Program Director for Young Adults Program. The reasons cited for the final written reprimand were alleged inappropriate and unprofessional conduct.
- 4. I vehemently deny that I engaged in either form of misconduct. Moreover, I charged a male subordinate of mine, Garrett Raubolt, with the same conduct toward me, however he was not issued a final written reprimand.

III. A. ISSUE/BASIS

FINAL WRITTEN REPRIMAND - MARCH 26, 2007, DUE TO MY AGE, 55

B. PRIMA FACIE ALLEGATIONS

- 1. I am 55 years old.
- 2. My work performance as Assistant Program Director for Young Adult Programs met Respondent's expectations. I was hired on October 23, 2006.
- 3. On March 26, 2007, I was issued a final written warning by Patricia Biggs (50's), Program Director for Young Adults Program. The reasons cited for the final written reprimand were alleged inappropriate and unprofessional conduct.
- 4. I vehemently deny that I engaged in either form of misconduct. Moreover, I charged a younger subordinate of mine, Garrett Raubolt (29), with the same conduct toward me, however he was not issued a final written reprimand.

(Continued)

Complainant: Diane M. Dillon Phillips

Charge Number: 2007CA2813

Page 3

IV. A. ISSUE/BASIS

FINAL WRITTEN REPRIMAND – MARCH 26, 2007, DUE TO MY RELIGION, CHRISTIAN

B. PRIMA FACIE ALLEGATIONS

- 1. My religious beliefs are sincere.
- 2. Respondent was aware of my religious beliefs.
- 3. My work performance as Assistant Program Director for Young Adult Programs met Respondent's expectations. I was hired on October 23, 2006.
- 4. On March 26, 2007, I was issued a final written warning by Patricia Biggs (religious beliefs unknown), Program Director for Young Adults Program.

 The reasons cited for the final written reprimand were alleged inappropriate and unprofessional conduct.
- 5. I vehemently deny that I engaged in either form of misconduct. Moreover, I charged a non-Christian subordinate of mine, Garrett Raubolt, with the same conduct toward me, however he was not issued a final written reprimand.

V. A. ISSUE/BASIS

DISCHARGE – APRIL 24, 2007, DUE TO MY RACE, BLACK

B. PRIMA FACIE ALLEGATIONS

- 1. My race is black.
- 2. My work performance as Assistant Program Director for Young Adult Program met Respondent's expectations. I was hired on October 23, 2006.
- On April 24, 2007, I was discharged by Patricia Biggs (white), Program
 Director for Young Adult Programs. The reason cited for the discharge
 was for alleged inappropriate and unprofessional conduct.
- 4. I vehemently deny that I engaged in either form of misconduct.

 Moreover, I charged a non-black subordinate of mine, Garrett Raubolt, with the same conduct toward me, however he was not discharged.

VI. A. ISSUE/BASIS

DISCHARGE – APRIL 24, 2007, DUE TO MY DUE TO MY SEX, FEMALE

B. PRIMA FACIE ALLEGATIONS

1. My sex is female.

Complainant: Diane M. Dillon Phillips

Charge Number: 2007CA2813

Page 5

XI. A. ISSUE/BASIS

DISCHARGE - APRIL 24, 2007, DUE TO MY MENTAL HANDICAP, ANXIETY DISORDER

B. PRIMA FACIE ALLEGATIONS

- 1. I am a handicapped individual within the meaning of Section 1-103 (I) of the Illinois Human Rights Act.
- 2. Respondent was aware of my mental handicap.
- 3. My work performance as Assistant Program Director for Young Adult Programs met Respondent's expectations. I was hired on October 23, 2006.
- 4. On April 24, 2007, I was discharged by Patricia Biggs, Program Director for Young Adults Program. The reasons cited for the discharge reprimand were alleged inappropriate and unprofessional conduct.
- 5. I vehemently deny that I engaged in either forms of misconduct. Moreover, I charged a non-handicapped subordinate of mine, Garrett Raubolt, with the same conduct toward me, but he was not discharged.
- 6. My condition is unrelated to my ability to perform the essential functions of my job duties as an assistant program director for young adult programs.

X. A. ISSUE/BASIS

DISCHARGE – APRIL 24, 2007, DUE TO MY MENTAL HANDICAP, POST TRAUMATIC SYNDROME DISORDER

B. PRIMA FACIE ALLEGATIONS

- 1. I am a handicapped individual within the meaning of Section 1-103 (I) of the Illinois Human Rights Act.
- 2. Respondent was a ware of my mental handicap.
- 3. My work performance as Assistant Program Director for Young Adult Programs met Respondent's expectations. I was hired on October 23, 2006.
- 4. On April 24, 2007, I was discharged by Patricia Biggs, Program Director for Young Adults Program. The reasons cited for the discharge were alleged inappropriate and unprofessional conduct.
- 5. I vehemently deny that I engaged in either form of misconduct. Moreover, I charged a non-handicapped subordinate of mine, Garrett Raubolt, with the same conduct toward me, but he was not discharged.